



YADGAROV & ASSOCIATES, PLLC.

608 Fifth Avenue, Suite 1000 ~ New York N.Y. 10020
Phone: 212-581-2500 ~ Fax: 212-581-2525

MEMO ENDORSED

August 11, 2020

Hon. Ona T. Wang, USMJ
Southern District of New York
500 Pearl Street, Room 20D
New York, NY 10007

Parties are directed to submit a joint status letter on Sept. 11, 2020.
SO ORDERED.

/s/ Ona T. Wang 8/12/20
U.S.M.J.

Re: Gomez v. Francois and LG Waay, Inc., Docket No. 20-cv-0670-OTW

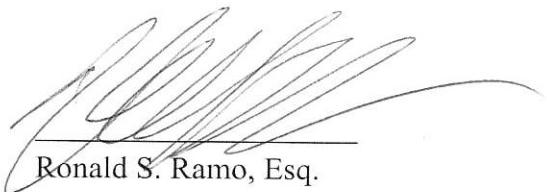
Dear Magistrate Wang:

The parties submit this joint discovery letter pursuant to the Court's order of August 7, 2020, directing the parties to comply with the Court memo order of July 1, 2020, on or before August 11, 2020, by providing the Court with a status update on the progress of discovery.

At this time the parties have exchanged interrogatories, and notice to produce and the parties are working to provide responses at this time. The main impediment for the parties providing responsive answers is that documents in the possession, custody and control of the parties from third party custodians currently in possession of those records. The Plaintiff's deposition has been tentatively scheduled for September 7, 2020; however, the parties may need to adjourn the deposition on the basis that Wanda Gomez is still planning to undergo a neck surgery related to this accident. If the surgery occurs before September 7 the Plaintiff could be physically unable to proceed or if scheduled before September 7, the parties are of the opinion it would be better to adjourn the deposition to a date after the surgery to avoid a second deposition of the Plaintiff. The deposition of the Defendants have yet to be scheduled because counsel for the parties are still trying to determine if the trial in this action, if any, should be limited to questions of

damages (including threshold, if applicable). Fortunately, Defendant's counsel has located Mr. Francois and is currently making arrangements to interview him with a Creole interpreter. The parties believe that expert discovery will be complete on or before November 30, 2020, however, the end date would be subject to change if the Plaintiff's surgery is not scheduled until after the September 7, 2020, deposition occurs.

Jointly Submitted



Ronald S. Ramo, Esq.
For Plaintiff



Jennifer A. Robinson, Esq.
For Defendants